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VIA ECF

April 27, 2022

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 1007

Re: In re Terrorist Attacks of September 11, 2001, 03 MDL 1570

Dear Judge Netburn:

Dubai Islamic Bank (“DIB”) and Plaintiffs with claims against DIB (“Plaintiffs”), jointly write to respectfully request that the Court enter a new schedule for DIB’s challenge to personal jurisdiction in light of recent developments.

On March 29, 2022, the U.S. government provided Plaintiffs with access to new documents. DIB obtained access to those documents on April 18, 2022. As a result of these new documents, Plaintiffs amended their responses to DIB’s requests for admission.

In light of this government production and Plaintiffs’ amended discovery responses, the parties believe the most efficient way to proceed is for DIB to withdraw its brief that is presently pending before the Court and file a new brief in support of its challenge to personal jurisdiction that accounts for these developments.

DIB filed its initial personal jurisdiction motion on December 3, 2021 (ECF No. 7419). Under the existing schedule, Plaintiffs’ opposition to that motion is currently due on April 29, 2022 (ECF No. 7789). The Court previously extended Plaintiffs’ opposition deadline while the parties engaged in negotiations in an attempt to obviate the need for the Court to rule on DIB’s motion. Those discussions have concluded without success. The parties thank the Court for its patience during these discussions.

As a result, DIB and Plaintiffs respectfully request that the Court enter an order noting that DIB has withdrawn its previous brief and setting a new briefing schedule as follows:

- June 17, 2022: Deadline for DIB to file a new memorandum in support of its personal jurisdiction motion (ECF No. 7419) limited to 30 pages.
- August 3, 2022: Deadline for Plaintiffs to file opposition to DIB’s challenge to personal jurisdiction limited to 30 pages.

- September 16, 2022: Deadline for DIB to file its reply in support of its challenge to personal jurisdiction limited to 15 pages.

DIB and Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully Submitted,
/s/ Steven T. Cottreau
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cc: All MDL Counsel of Record (via ECF)